

# METHODOLOGICAL NOTE

## Publication of transfers of value 2025 - Deutschland

Ferrer Deutschland GmbH is committed to transparency in its interactions with Healthcare Professionals (HCPs) and Healthcare Organisations (HCOs). As a member of the Freiwillige Selbstkontrolle für die Arzneimittelindustrie e.V. (FSA), Ferrer Deutschland complies with the FSA Transparency Code and the EFPIA Disclosure Code. This methodological note explains the principles applied for the disclosure of transfers of value for the reporting year 2025.

### 1. Definitions

#### 1.1 Recipients

For the purposes of this methodological note, recipients are understood to be Healthcare Professionals (HCPs) and Healthcare Organisations (HCOs) that may directly or indirectly receive reportable transfers of value from Ferrer Deutschland GmbH. In the case of HCPs, this includes those who carry out their professional activity or have their main professional address in Germany. In the case of HCOs, this includes those whose place of incorporation is located in Germany, provided that the transfer of value is reportable in accordance with the scope and criteria of this note.

- **Healthcare Professionals (HCPs):** any member of the medical profession, dentist, pharmacist, nurse or podiatrist who, in the course of their profession, performs actions related to the sale, distribution, administration or prescription of medicinal products. This also includes professionals involved in the distribution of medicinal products, wholesalers, persons working in health administration and managers of healthcare centres, among others.

Retired or deceased Healthcare Professionals and other special cases: Ferrer publishes all transfers of value made to those persons who, at the time such transfers were made, met the definition of HCP in accordance with applicable German legislation and the FSA Transparency Code.

- **Healthcare Organisations (HCOs):** any legal person or entity that is a medical or scientific association, healthcare institution, hospital, clinic, foundation, university or other academic entity, scientific society (excluding patient organisations), or entity through which one or more HCPs provide services.

Other relevant concepts:

**Event:** a scientific-professional meeting, congress, conference, symposium, workshop, in-person or distance training course, expert meeting, site visit or similar activity organised or sponsored by Ferrer, or under its control through third parties.

**Interaction:** an activity carried out, organised or sponsored by Ferrer Deutschland or by third parties, which may directly or indirectly give rise to collaborations, support or consideration in favour of a recipient.

**Transfer of value:** any direct or indirect payment or consideration, in cash, in kind or in any other form, irrespective of its purpose.

## 1.2 Types of transfers of value

Transfers of value are grouped in accordance with the categories set out in the FSA Transparency Code and the EFPIA Disclosure Code, adapted to the operations described by Ferrer:

- **Donations and grants to Healthcare Organisations:** monetary or in-kind contributions made in favour of an HCO, accepted by it and with no consideration for Ferrer. Where the donation is in kind, the legislation or codes applicable according to the type of product will be respected. In 2025, no in-kind donations were made.  
No donations or grants were disclosed by Ferrer Deutschland GmbH during the reporting year 2025. Not applicable.
- **Contributions to educational activities or scientific and professional meetings:** collaborations in congresses, scientific meetings and professional events organised by third parties or by Ferrer. They include sponsorships, stands, symposia, registration fees, travel and accommodation for HCPs, where applicable.
- **Sponsorship:** Any funding or financial support activity whereby Ferrer makes a contribution to an event, meeting, study, scientific activity or similar initiative. As a result of this collaboration, Ferrer receives, directly or indirectly, consideration, a return or an associated benefit.
- **Provision of services:** A contractual relationship formalised in advance in writing, under which Ferrer engages an HCP and HCO to provide a specific advisory or consultancy service intended to address a legitimate need previously identified and documented. Such engagement is based on the third party's specific experience, knowledge or capability and entails reasonable, proportionate remuneration aligned with market value, which may not constitute an undue incentive or a covert or improper promotional activity.
- **Research and Development (R&D):** activities associated with the design or execution of preclinical studies, clinical trials and prospective post-authorisation studies, as well as transfers related to fees, meetings and scientific events linked to these studies. These transfers are published in aggregate form.
- **Other transfers:** Not applicable for the 2025 publication

## 1.3 Abbreviations and names used

- **Ferrer Deutschland GmbH:** the legal entity responsible for transfers of value managed from Germany. For the purposes of this note, it is referred to as "Ferrer".
- **EFPIA:** European Federation of Pharmaceutical Industries and Associations.
- **HCP:** Healthcare Professional.
- **HCO:** Healthcare Organisation.

- **R&D:** Research and Development.
- **FSA:** Freiwillige Selbstkontrolle für die Arzneimittelindustrie e.V.

## 2. Scope of the publication / transparency report

### 2.1 Products

The transparency report refers to collaborations related to prescription-only medicinal products. Other product categories (for example, medicinal products advertised to the public or other products) are not included in this document.

### 2.2 Company

This publication applies to Ferrer Deutschland GmbH and covers transfers of value made directly or indirectly to Healthcare Professionals and Healthcare Organisations in accordance with the FSA Transparency Code and the EFPIA Disclosure Code.

### 2.3 Excluded transfers of value

Transfers that do not fall within the scope of the report or that do not generate a cost ultimately borne by Ferrer are excluded from the publication or are not included in the corresponding category. In particular:

- Transfers not related to prescription-only medicinal products.
- Planned transfers that ultimately do not take place and do not generate associated expenses for Ferrer.
- Costs cancelled in time and without any associated cost for Ferrer, such as cases where an HCP does not attend a congress.
- Logistics, construction or design costs associated with stands, symposia or other participation in congresses, where they do not constitute a reportable transfer of value to the recipient.

### 2.4 Date of transfers of value

Collection is carried out by calendar year. For the 2025 publication, transfers accrued between 1 January and 31 December 2025 will be used as reference, with publication within six months following the end of the year. The information will remain published on a cumulative basis until three full years are available; thereafter, the first year will be replaced by the fourth year, and so on.

Time allocation criteria:

- Scientific events: the start date of the event recorded in the data collection system is used.
- Professional fees linked to the provision of training services: the start date of the associated scientific event is used.
- Professional fees for advisory services or other activities not linked to a scientific event: the start date of the payment processing for the service provided is used.
- Donations: the date of the collaboration is used as reference.

These criteria seek to ensure compliance with the accrual accounting principle for the interaction. The disclosed information remains publicly available for a minimum period of three years in accordance with the FSA Transparency Code.

## **2.5 Direct transfers of value**

These are transfers made directly by Ferrer, where applicable, to the beneficiary without an intermediary. They are published in the relevant category according to their nature: donation, collaboration in scientific meetings, provision of services, R&D or another applicable category.

## **2.6 Indirect transfers of value**

These are transfers made by third parties engaged by Ferrer or acting on its behalf, where the relevant entity identifies or can identify the recipient. For publication purposes, indirect transfers are treated in the same way as transfers made directly.

When intermediaries are engaged to organise scientific events or manage payments to HCPs, and HCOs, a contract is signed in which such intermediaries undertake to comply with the legislation in force and the applicable Code, passing this obligation on to the recipients engaged by them where appropriate.

## **2.7 Non-monetary transfers of value (in kind)**

In-kind transfers are included when they constitute a reportable transfer of value. In such transfers, the value will be determined according to the market price or the corresponding calculation criterion, always respecting the legislation or codes applicable depending on the type of product. Where there are no in-kind transfers in the relevant year, this section shall be understood as not applicable for the purposes of the annual publication.

In 2025, there were no in-kind transfers of value. Not applicable.

## **2.8 Transfers arising from partial participation, cancellation and reimbursement**

Where a transfer of value has been planned for an HCP's attendance at a congress, such as registration, travel or accommodation, and the HCP is ultimately unable to attend, the cancellation costs borne by Ferrer will be published where applicable. If the non-attendance is known sufficiently in advance and the booking is cancelled without associated cost, no amount will be published.

For other transfers that are not executed, such as fees or donations, no amount will be published if there is no associated expense. There is no specific differentiated rule for partial participation; therefore, the criterion of cost actually accrued or borne will apply. Under no circumstances are HCPs directly reimbursed for registration, travel or accommodation costs when these are managed by Ferrer or by its agencies/providers.

Cancellation costs that do not result in a benefit to a Healthcare Professional are not disclosed.

## **2.9 Cross-border activities or collaborations**

Transfers of value are disclosed in the country where the Healthcare Professional has his or her principal practice or where the Healthcare Organisation is registered, in accordance with EFPIA and FSA requirements.

No reportable cross-border transfers of value were identified for the reporting period. Not applicable.

## **2.10 Research and Development**

No reportable Research and Development transfers of value were disclosed during the reporting period. Not applicable.

## **3. Specific considerations**

### **3.1 Unique identification code**

Ferrer Deutschland GmbH maintains internal records for Healthcare Professionals and Healthcare Organisations participating in reportable activities. Recipient data are verified prior to publication to ensure completeness and accuracy.

### **3.2 Self-employed Healthcare Professional**

In accordance with the FSA Transparency Code and the EFPIA Disclosure Code, transfers of value are disclosed at the level of the ultimate recipient wherever this can be determined accurately and consistently.

### **3.3 Contracts with a duration exceeding one year**

For contracts with a duration exceeding one year, Ferrer will publish in each financial year the amount corresponding to the accrual for the relevant calendar year, taking into account the type of contract and the time allocation criteria described in section 2.4. Where a multi-year contract includes different milestones, activities or payments, each transfer will be allocated to the financial year in which the corresponding activity, service or transfer accrues. For events, provision of services, donations and R&D, the specific date and accrual criteria set out in section 2.4 will apply.

### **3.4 Country-specific characteristics**

Interactions with Healthcare Professionals and Healthcare Organisations are governed by the FSA Transparency Code and the EFPIA Disclosure Code.

Scientific meetings supported by Ferrer Deutschland must have a legitimate scientific or educational purpose. Hospitality, travel and accommodation must remain appropriate and secondary to the scientific purpose of the event.

Compensation for services provided by Healthcare Professionals and Healthcare Organisations must be reasonable, proportionate and consistent with fair market value principles.

### **3.5 Review or audit of information quality**

Before publication, the information on transfers of value to HCPs and HCOs related to prescription-only medicinal products contained in the system is verified. If any personal data is

missing or a possible inconsistency or error is detected, the HCO or HCP is contacted to supplement or verify the information, with the aim of ensuring that publications are as accurate as possible.

Ferrer has an IT platform that collects transfers of value and an internal approval process to ensure compliance with the FSA Transparency Code and applicable internal policies.

There are also internal controls to approve engagements, sponsorships, donations and other interactions before their execution.

## **4. Personal data protection. Legal basis**

### **4.1 Request for consent, withdrawal of consent and partial consent**

The disclosure of Transfers of Value to Healthcare Professionals is carried out in accordance with the applicable transparency requirements under the FSA Transparency Code and the EFPIA Disclosure Code.

For each transfer of value made to an individual healthcare professional, Ferrer requests the healthcare professional's consent to disclose the relevant information on an individual named basis. This consent is requested specifically in relation to the corresponding transfer of value.

Where the healthcare professional provides consent, the transfer of value will be disclosed individually, including the healthcare professional's name and the relevant information associated with the transfer of value, in accordance with the applicable disclosure categories.

This approach ensures that Ferrer supports transparency regarding interactions with healthcare professionals while respecting applicable data protection requirements.

### **4.2 Legitimate interest, balancing test and right to object**

In accordance with the applicable German transparency requirements and current local practice, Ferrer does not rely on legitimate interest as the legal basis for the individual disclosure of Transfers of Value made to Healthcare Professionals. As Ferrer does not rely on legitimate interest for individual disclosure in Germany, no legitimate interest balancing test is performed for this purpose, and the specific right to object associated with processing based on legitimate interest does not apply in this context.

### **4.3 Aggregated Disclosure**

Where the healthcare professional does not provide consent, or withdraws consent where applicable, Ferrer will not disclose the transfer of value on an individual named basis. In such cases, the relevant transfer of value will be included in the aggregated disclosure section, in accordance with the applicable transparency rules.

The aggregated disclosure includes the total amount of transfers of value and the number of recipients concerned. Such recipients are not individually identified in the publication.

## 5. Information collection template

### 5.1 Publication date

The publication is made annually, within six months following the end of each calendar year.

### 5.2 Publication platform

Data relating to transfers of value made by Ferrer Deutschland GmbH, directly or indirectly, are published on Ferrer's corporate transparency website. The Germany section of the website contains the disclosures relating to Ferrer Deutschland GmbH in accordance with the FSA Transparency Code and the EFPIA Disclosure Code.

### 5.3 Language of publication

The information is published in German and English.

## 6. Published economic and financial information

### 6.1 Currency

The publication currency is the euro. When a transaction occurs in a currency other than the euro, the exchange rate published by the European Central Bank on the registration date and the payment exchange rate at the time of payment will be applied, with any exchange difference being recorded in the financial statements.

### 6.2 Taxes included or excluded

Transfers of value are disclosed as gross amounts. The published amount represents the total value of the transfer of value before any deductions, taxes or other charges are applied.

Where applicable, value-added tax (VAT) is included in the disclosed amount in accordance with German tax regulations. As a result, the published amount may differ from the amount ultimately received by the Healthcare Professional or Healthcare Organisation.

This approach is intended to ensure consistency, transparency and comparability of all disclosed transfers of value.

### 6.3 Calculation rules

The calculation rules are applied according to the nature of the transfer of value:

- Gross amounts: all transfers are published at their gross value, without prejudice to the subsequent application of taxes or withholdings.
- In-kind transfers: they are valued according to the market price or the objective criterion corresponding to the good, product, material or service delivered.
- Events with several sponsored HCPs: transfers are allocated individually. The provider reports the unit costs of tickets, accommodation and registration fees associated with each HCP.
- Registration fees: the amounts set by the HCO organising the congress or by its official secretariat are published; these may vary according to the HCP's status (for example, HCO member or resident). Ferrer does not directly reimburse the HCP for the registration fee.

- Event sponsorships with invitations or registrations assignable to HCPs: where sponsorship of an HCO includes invitations, registrations or other participation rights for identified HCPs, the value attributable to each HCP will be separated and published under the corresponding heading where it can be individualised. The remaining amount will be published as sponsorship or collaboration to the organising or beneficiary HCO, according to the available documentation and the applicable criterion.
- Travel and accommodation: the cost borne by Ferrer or by its approved agencies is published, limited to the days of the event and in accordance with applicable FSA Transparency Code requirements. No direct reimbursement is made to the HCP.
- Event sponsorships: when Ferrer pays the sponsorship to the official secretariat, the transfer is published in the name of the HCO that organises the congress, even if that HCO does not receive the payment directly from Ferrer.
- Provision of services: fees must be based on market criteria, be commensurate with the time spent, the work performed and the responsibilities assumed and be paid in monetary form.
- Research and Development: transfers are published in aggregate form, except for retrospective observational studies, which are published under provision of services where applicable.
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## 7. Additional information

### 7.1 Ferrer's commitment to transparency

Gaining society's trust is key for Ferrer. Therefore, Ferrer publishes its interactions with healthcare professionals and healthcare organisations as part of its commitment to transparency and continuous improvement in relationships with third parties.

The published interactions are necessary and legitimate for the sector, as they contribute to research and scientific training, facilitate better knowledge of diseases and available treatments, and enable the pharmaceutical industry to incorporate the experience and knowledge of HCOs and HCPs into pharmaceutical research.

Ferrer's mission to advance society's well-being affects both the way it works and the activities promoted in the fields of corporate social responsibility, patient support, training of healthcare professionals, local projects and environmental sustainability.

### 7.2 Reference documents

- EFPIA Disclosure Code.
- FSA Transparency Code
- FSA Code of Conduct
- Ferrer Privacy Policy, in relation to the processing of personal data.

### 7.3 Legal notice on the publication procedure

Ferrer uses a combination of automated systems, standardised procedures and manual data entry by internal and external resources to collect the relevant information and subsequently publish it. The published information reflects Ferrer's good faith in complying with the applicable provisions of the FSA Transparency Code and the EFPIA Disclosure Code.

If, despite best efforts to ensure that the publication faithfully reflects the transfers of value made, correct or complete information has not been included, Ferrer will investigate the case and provide an appropriate response where the information is incorrect, in accordance with the prior verification and exercise of rights procedures described in this note.

The information published in accordance with the requirements of the Code will be used solely for the purpose of complying with its provisions. HCPs or HCOs who consult the published data will be subject to the terms of use set out in the legal notice on the Ferrer website.